


CF:MPB  
F. #2003R00888

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

CORY MARCANO,  
also known as "Trigger Black,"  
  
ZACKIE CAMPBELL,  
CORNELIUS DRAPER,  
LEDRELL HART,  
also known as "Corey," and  
TIAFOLOUS SPENCER,  
also known as "T-Bo,"

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

COUNT ONE

1. On or about and between July 1, 2001 and July 9, 2001, both dates being approximate and inclusive, within the Eastern District of New York, the defendant CORY MARCANO, also known as "Trigger Black," together with others, did knowingly and intentionally conspire to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery of a drug trafficker in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

S U P E R S E D I N G  
I N D I C T M E N T

Cr. No. 03-537(S-1)(RJD)  
(T. 18, U.S.C., §§  
924(c)(1)(A)(iii),  
924(j)(1), 1512(a)(2)(C),  
1512(a)(3)(B)(ii), 1512(k),  
1513(b)(2), 1513(e),  
1951(a), 2 and 3551 et seq.;  
T. 21, U.S.C., §§ 846,  
841(a)(1), 841(b)(1)(A)(iii)  
and 841(b)(1)(C))

COUNT TWO

2. On or about July 9, 2001, within the Eastern District of New York, the defendant CORY MARCANO, also known as "Trigger Black," together with others, did knowingly and intentionally attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by the attempted robbery of a drug trafficker in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT THREE

3. On or about July 9, 2001, within the Eastern District of New York, the defendant CORY MARCANO, also known as "Trigger Black," did knowingly and intentionally possess a firearm in furtherance of crimes of violence, to wit: the crimes charged in Counts One and Two, and did knowingly and intentionally use and carry a firearm during and in relation to those crimes of violence.

(Title 18, United States Code, Sections 924(c)(1)(a)(iii) and 3551 et seq.)

COUNT FOUR

4. On or about July 9, 2001, within the Eastern District of New York, the defendant CORY MARCANO, also known as "Trigger Black," in the course of a violation of Title 18, United States Code, Section 924(c), to wit: the crime charged in Count

Three, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing is murder as defined by Title 18, United States Code, Section 1111(a), in that MARCANO, with malice aforethought, did unlawfully kill Wesley Thomas willfully, deliberately, maliciously and with premeditation.

(Title 18, United States Code, Sections 924(j)(1), 2 and 3551 et seq.)

COUNT FIVE

5. In or about and between July 2001 and April 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CORY MARCANO, also known as "Trigger Black," [REDACTED] ZACKIE CAMPBELL, CORNELIUS DRAPER and LEDRELL HART, also known as "Corey," together with others, did knowingly and intentionally conspire to engage in conduct and thereby cause bodily injury to another person, to wit: John Doe, whose identity is known to the Grand Jury, with intent to retaliate against John Doe for providing to a law enforcement officer information relating to the commission and possible commission of Federal offenses, in violation of Title 18, United States Code, Section 1513(b)(2).

6. In furtherance of this conspiracy and to effect its objectives, within the Eastern District of New York and elsewhere, the defendants CORY MARCANO, also known as "Trigger

Black," [REDACTED] ZACKIE CAMPBELL, CORNELIUS DRAPER and LEDRELL HART, also known as "Corey," together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

a. In or about February 2003, the defendant [REDACTED] [REDACTED] and other co-conspirators assaulted John Doe and broke his leg.

b. On or about April 8, 2003, the defendants [REDACTED] [REDACTED] ZACKIE CAMPBELL, CORNELIUS DRAPER and LEDRELL HART struck John Doe with a firearm, iron and an extension cord, poured bleach into John Doe's wounds and poured bug repellant into John Doe's eyes.

(Title 18, United States Code, Sections 1513(e), 1513(b)(2) and 3551 et seq.)

COUNT SIX

7. On or about April 8, 2003, within the Eastern District of New York, the defendants [REDACTED] ZACKIE CAMPBELL, CORNELIUS DRAPER and LEDRELL HART, also known as "Corey," together with others, did knowingly and intentionally engage in conduct and thereby cause bodily injury to another person, to wit: John Doe, with intent to retaliate against John Doe for providing to a law enforcement officer information

relating to the commission and possible commission of Federal offenses.

(Title 18, United States Code, Sections 1513(b)(2), 2 and 3551 et seq.)

COUNT SEVEN

8. In or about and between July 2001 and April 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CORY MARCANO, also known as "Trigger Black," [REDACTED] ZACKIE CAMPBELL, CORNELIUS DRAPER and LEDRELL HART, also known as "Corey," together with others, did knowingly and intentionally conspire to use physical force and the threat of physical force against another person, to wit: John Doe, with intent to hinder, delay and prevent the communication by John Doe to a law enforcement officer of information relating to the commission and possible commission of Federal offenses, in violation of Title 18, United States Code, Section 1512(a)(2)(C).

9. In furtherance of this conspiracy and to effect its objectives, within the Eastern District of New York and elsewhere, the defendants CORY MARCANO, also known as "Trigger Black," [REDACTED], ZACKIE CAMPBELL, CORNELIUS DRAPER and LEDRELL HART, also known as "Corey," together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

a. In or about February 2003, the defendant [REDACTED] and other co-conspirators assaulted John Doe and broke his leg.

b. On or about April 8, 2003, the defendants [REDACTED] ZACKIE CAMPBELL, CORNELIUS DRAPER and LEDRELL HART struck John Doe with a firearm, iron and an extension cord, poured bleach into John Doe's wounds and poured bug repellant into John Doe's eyes.

(Title 18, United States Code, Sections 1512(k), 1512(a)(3)(B)(ii) and 3551 et seq.)

COUNT EIGHT

10. On or about April 8, 2003, within the Eastern District of New York, the defendants [REDACTED] ZACKIE CAMPBELL, CORNELIUS DRAPER and LEDRELL HART, also known as "Corey," together with others, did knowingly and intentionally use physical force and the threat of physical force against another person, to wit: John Doe, with intent to hinder, delay and prevent the communication by John Doe to a law enforcement officer of information relating to the commission and possible commission of Federal offenses.

(Title 18, United States Code, Sections 1512(a)(2)(C), 1512(a)(3)(B)(ii), 2 and 3551 et seq.)

COUNT NINE

11. In or about and between January 2000 and May 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CORY MARCANO, also known as "Trigger Black," [REDACTED] ZACKIE CAMPBELL, CORNELIUS DRAPER, LEDRELL HART, also known as "Corey," and TIAFOLOUS SPENCER, also known as "T-Bo," together with others, did knowingly and intentionally conspire to distribute and to possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a substance containing cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TEN

12. On or about April 1, 2004, within the Eastern District of New York, the defendant TIAFOLOUS SPENCER, also known as "T-Bo," did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a

substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

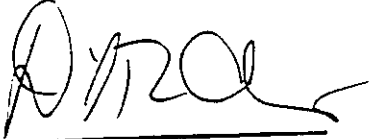
A TRUE BILL

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FOREPERSON

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ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. 0.136